

REDACTED

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-9-E**

IN RE: South Carolina Electric & Gas)
Company's Integrated Resource Plan) **INTERVENOR, SOUTH CAROLINA**
(IRP)) **SOLAR BUSINESS ALLIANCE, INC.'S**
) **FIRST**
) **REQUEST FOR ADMISSIONS**
)
TO: K. CHAD BURGESS, ESQUIRE, ATTORNEY OF RECORD FOR SOUTH
CAROLINA ELECTRIC & GAS COMPANY:

Intervenor, South Carolina Solar Business Alliance, Inc., (hereinafter as, “SCSBA”), pursuant to Reg. 103-835 and Rule 36, of the South Carolina Rules of Civil Procedure, hereby serves, **South Carolina Electric & Gas Company**, (hereinafter as, “SCE&G”) with Intervenor, South Carolina Solar Business Alliance, Inc.’s First Request for Admissions, to be answered separately within twenty (20) days from the date of service hereof. Please set forth SCE&G’s answers separately, after restating the question.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **“You” or “your” shall refer to, SCE&G.**
2. **The conjunctions “and” and “or” shall be interpreted** in each and every instance as meaning “and/or” and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made herein.
3. **“Document” shall mean** all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase

orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA's, Blackberry's or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of SCE&G and specifically includes the computer and or laptop computers utilized by Representatives of SCE&G. Media means media, as broadly as the term "media" may be defined, that contains electronic data, as to the Interaction between SCSBA and SCE&G.

4. **"Identify" or "identity"** used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the same time in question.

5. **"Identify" or "identity"** used with reference to a writing means to state the date, author, type of document (e.g. letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in your possession or subject to their control, state what disposition was made of the document(s).

6. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

FIRST REQUEST FOR ADMISSIONS

1. Admit that the climate in SCE&G's service area remains generally hotter in the summer than colder in the winter.
2. Admit that: (a) the penetration of air-conditioners among SCE&G's customers approaches 100%; and (b) there are no real substitutes for electric air-conditioners at present.
3. Admit that peak summer usage on SCE&G's system tends to occur at times when the weather is very hot.
4. Admit that there is a positive correlation between ambient temperatures in Your service area and peak usage on SCE&G's system.
5. Admit that there is a negative correlation between cloud cover and ambient temperatures in Your service area.
6. Admit that winter peak demands on Your system that are infrequent and of short duration can be accommodated using a peak clipping program, a demand response program, or some other narrowly targeted solution that is less costly than investing in additional generating capacity.
7. Admit that expansion plan CC2028 (adding a Combined Cycle plant in 2028) assumes the purchase of firm capacity on the wholesale purchased power market on a year-round basis (including both winter mornings and summer afternoons) during the years 2019 through 2027.
8. Admit that you estimated "Total Production" costs for the years 2018 through 2057 under expansion plan CC2028 BEGIN CONFIDENTIAL
END CONFIDENTIAL which includes the purchase of firm capacity on the wholesale purchased power market on a year-round basis (including both winter mornings and summer afternoons) during the years 2019 through 2027.
9. Admit that it would be less costly to purchase firm capacity on the wholesale purchased power market on a targeted basis, during the hours of 5:00 a.m. until 10:00 a.m. during the months of December, January and February, than what you estimated it would cost to purchase that amount of capacity on a year-round basis, including both winter mornings and summer afternoons.

10. Admit that you estimated “Total Production” costs for the years 2018 through 2057 under expansion plan CC2023 (adding a Combined Cycle plant in 2023) BEGIN CONFIDENTIAL END CONFIDENTIAL less than the corresponding “Total Production” costs under expansion plan CC2028.

11. Admit that you estimated “Capacity Costs” for the years 2018 through 2057 under expansion plan CC2023 (adding a Combined Cycle plant in 2023) BEGIN CONFIDENTIAL END CONFIDENTIAL.

12. Admit that you estimated “Capacity Costs” for the years 2018 through 2057 under expansion plan CC2028, BEGIN CONFIDENTIAL END CONFIDENTIAL less than the corresponding “Capacity Costs” under expansion plan CC2023.

13. Admit that you estimated the Levelized 60 Year Net Present Value (NPV) of expansion plan CC2023 to be BEGIN CONFIDENTIAL END CONFIDENTIAL more than the corresponding Levelized 60 Year Net Present Value (NPV) under expansion plan CC2028.

/s/

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May 8, 2018
Columbia, South Carolina